

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

TATUM ROBERTSON and EVE BRENNAN,
individually and on behalf of all those similarly
situated,

Plaintiffs,

v.

UNIVERSITY OF CENTRAL OKLAHOMA
and BOARD OF REGENTS FOR THE
REGIONAL UNIVERSITY OF OKLAHOMA,

Defendants.

Case No. 22-cv-836-HE

**JOINT MOTION FOR
(1) CLASS CERTIFICATION;
(2) PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT;
(3) APPROVAL OF PROPOSED
CLASS NOTICE; AND
(4) SCHEDULING OF FAIRNESS
HEARING**

Pursuant to Federal Rule of Civil Procedure 23, the Plaintiffs and Defendants, by and through their undersigned counsel, move the Court for the entry of an Order certifying this case as a class action for settlement purposes; preliminarily approving the proposed Settlement Agreement; approving the proposed Class Notice; and setting a date for a Fairness Hearing. The legal authority and arguments in support of the Motion are set forth in the attached Brief.

WHEREFORE, the Parties request that this Court enter an Order:

1. Certifying the case as a class action for settlement purposes pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(2) on behalf of a class defined as follows:

- a. All female students at the University of Central Oklahoma from September 20, 2022, through June 30, 2028, who participate in intercollegiate athletics at the University of Central Oklahoma, seek to participate in intercollegiate athletics at the University of Central Oklahoma, and/or are deterred from participating in intercollegiate athletics at the University of Central Oklahoma because they might or may not receive athletic benefits, opportunities, or treatment equal to male student-athletes.
- b. Appointing the named Plaintiffs as representatives of the class;

- c. Appointing Plaintiffs' counsel as class counsel, pursuant to Federal Rule of Civil Procedure 23(g);
2. Preliminarily approving the proposed Settlement Agreement;
3. Approving the proposed Class Notice; and
4. Setting a date for a Fairness Hearing pursuant to Rule 23(e)(2).

Respectfully Submitted,

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